



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUL 05 2017

CERTIFIED MAIL 7016 0600 0000 3846 8203
RETURN RECEIPT REQUESTED

City of Jackson
c/o Mr. Jerriot Smash
Interim Director
Department of Public Works
219 South President Street
P.O. Box 17
Jackson, Mississippi 39205-0015

Re: Water Quality Monitoring Program Comments
Consent Decree, Case No.: 3:12-cv-790 TSL-JMR

Dear Mr. Smash:

The U.S. Environmental Protection Agency Region 4 has reviewed the City of Jackson's (City) Water Quality Monitoring Program (WQM Program) document dated May 1, 2017, submitted by the City pursuant to the WQM Program Disapproval letter dated February 14, 2017. The EPA, after consultation with the Mississippi Department of Environmental Quality, has the following comments:

1. Section 4.2. pg 12, and Section 4.3 pg 13: "An elevated fecal coliform concentration is considered to be a concentration that is an order of magnitude greater than the established baseline concentration." An "order of magnitude" is generally 10X whatever value is being considered. Provide a definition, explanation, and/or the City's expectations of the term "order of magnitude." Define how "baseline concentration" is established.
2. Table 5-1, pg 17: Include the impacted creek in the table for each SIU. Are the sampling locations mapped in App B downstream of the SIUs location or collection system in which the SIUs discharge may be transmitted? If not, include a sampling point in the most likely location(s) in the creek(s) that will capture any SSO flow that contains sewage contaminated with the listed SIUs discharges.
3. Section 6.2 pg 20. Bacteria sampling should be included in the list of parameters to test for in order to integrate the MS4 sampling and the SSO investigative sampling. Add bacteria to the sampling parameters so as to conduct "investigative work required for source detection of unreported sewer discharges ..." (Section 6.3)

Pursuant to Paragraph 13 of the CD, the City shall resubmit the WQM Program that addresses the deficiencies listed above within 30 days of receipt of this letter. For the purposes of this comment letter, the City may submit changes to the May 1, 2017, submittal with instructions to add/delete language as appropriate to satisfy requirements of Paragraph 13. Failure to resubmit WQM Program (or changes as specified) may subject the City to stipulated penalties of \$500 per day for the first 30 days past the resubmittal date, and \$2,000 per day thereafter as set forth in Paragraph 65.(c) of the CD.

If you have questions regarding this notice and information request, please feel free to contact Mr. Dennis Sayre at (404) 562-9756.

Sincerely,

A handwritten signature in blue ink, appearing to read "Maurice L. Horsey, IV".

Maurice L. Horsey, IV, Chief
Municipal & Industrial Enforcement Section
NPDES Permitting & Enforcement Branch

cc: Mr. Les Herrington, P.E.
Mississippi Department of Environmental Quality

Mayor Tony Yarber
City of Jackson

Mr. Terry Williamson
City of Jackson